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Food Safety And Inspection Service
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AUDIT REPORT FOR BELGIUM
AUGUST 8 THROUGH AUGUST 23, 2001

INTRODUCTION

Background

This report reflects information that was obtained during an audit of Belgium's meat inspection system from August 8 through August 23, 2001. All seven establishments (B-6, B-45, B-477, B-156, CEE-135, EEG-93, and EEG-93-1) certified to export meat to the United States were audited. Two of these were slaughter establishments; the other five were conducting processing operations.

The last audit of the Belgian meat inspection system was conducted in May 2000. All eight establishments were audited: five establishments (B-6, B-45, CEE-135, B-156, and B-477) were acceptable, one establishment (B-75) was evaluated as acceptable/re-review, and two establishments (ECG-93 and EEG-93-1) were unacceptable. HACCP-implementation was deficient in all eight establishments visited.

During this new audit, seven of these establishments (B-6, B-45, B-156, and B-477, CEE-135, EEG-93, and EEG-93-1) were included in the new itinerary; one establishment (B-75) was not certified at the time. Implementation of the required HACCP programs was now found to be deficient in six (EEG-93, EEG-93-1, B-45, B-6, CEE-135, and B-477) of the seven establishments visited.

The major concerns from the previous audit were the following:

- In six establishments, pre-shipment document reviews were not performed.
- In two establishments, the records for pre-operational and operational sanitation SSOP and any corrective actions taken were not being maintained.
- In one establishment, the boneless meat reinspection program was not implemented as required.
- In all establishments, monthly supervisory visits were not performed. Only one or two internal reviews were conducted per year by the district officials in these establishments.
- In all establishments, the on-going verification activities of the HACCP program were not performed by the meat inspection officials.

- In one establishment, dripping condensate and leaking water from overhead pipes and ceilings that were not cleaned/sanitized daily was falling onto edible product.

- In one establishment, a conveyor belt for edible product in the boning room was broken in several places, deteriorated and worn out.

- In one establishment, product that contacted the floor (dropped meat) was not reconditioned in a sanitary manner before being added to edible product and there were no specific reconditioning procedures.

- In two establishments, sanitizers were not maintained at the required temperature (82C) in the boning and slaughter rooms.

- In two establishments, overhead ceilings, pipes, beams, supports, ceilings, and rails in the coolers and slaughter room were observed with accumulations of fat, old meat scraps, and black stains, rust, grease, dirt, and dust.

- In one establishment, flies were observed in the locker room and boning room.

- In two establishments, cross contamination of product and insanitary handling and storage of product were observed.

Belgium exports only pork processed products to the United States. Restrictions are placed on Belgian fresh pork and beef due to presence of hog cholera and Bovine Spongiform Encephalopathy (BSE).

As of end of May 2001, Belgian establishments exported 1,866,280 pounds of cured pork, canned hams, and canned picnics to the U.S. Port-of-entry rejections were for composition/standards (0.08%) and transportation damage (0.04%).

PROTOCOL

This on-site audit was conducted in four parts. One part involved visits with Belgian national meat inspection officials to discuss oversight programs and practices, including enforcement activities. The second entailed an audit of a selection of records in the meat inspection headquarters facilities preceding the on-site visits. All five establishments certified to export meat to the United States were selected for on-site audits. The third was conducted by on-site visits to establishments. The fourth was a visit to one laboratory, performing analytical testing of field samples for the national residue testing program, and culturing field samples for the presence of microbiological contamination with *Salmonella*.

Belgium's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and

Critical Control Point (HACCP) systems and the *E. coli* testing program, and (5) enforcement controls, including the testing program for *Salmonella* species.

In accordance with the European Union/United States Veterinary Equivalence Agreement, the auditors audited the meat inspection system using European Directives, specifically Council Directives 96/23/EC of April 29, 1996, 96/22/EC of April 29, 1996, and 64/433/EEC of June 1964. These three directives have been declared equivalent under the Agreement. In areas not covered by these directives, the auditors audited against FSIS requirements and equivalence determinations.

During all on-site establishment visits, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the United States and are delisted accordingly by the country's meat inspection officials (this was the case with four establishments EEG-93, CEE-135, B-6, and EEG-93-1).

RESULTS AND DISCUSSION

Summary

Effective inspection system controls were found to be in place in only three of the seven establishments: One of these three (B-45) was recommended for re-review. Four establishments (EEG-93, EEG-93-1, CEE-135, and B-6) were found to be unacceptable. Details of audit findings, including compliance with HACCP, SSOPs, and testing programs for *Salmonella species* and generic *E. coli,* are discussed later in this report. Establishment reports can be found in Attachment F.

As stated above, numerous major concerns had been identified during the last audit of the Belgian meat inspection system, which was conducted in May 2000.

During this new audit, the auditors determined that some of these major concerns had been addressed and corrected by the Belgian Ministry of Public Health (MPH). However, the following deficiencies identified in the May 2000 audit had not been addressed and corrected.

- Continuing problems with pre-shipment document reviews.

- The ongoing verification activities of the HACCP program were not performed adequately by MPH meat inspection officials.

- Inadequate implementation of SSOP. The records for pre-operational and operational sanitation activities and any corrective actions taken were not being maintained.

- Monthly supervisory visits were not performed in certified establishments.

- Boneless meat inspection program was not implemented as required.
- Serious sanitation deficiencies, including direct product contamination, were found in two of seven establishments.

- Product that contacted the floor (drop meat) was not reconditioned in a sanitary manner before being added to edible product and there was no specific reconditioning procedures.

- In two establishments, sanitizers were not maintained at the required temperature (82C) in the boning and slaughter rooms.

- In two establishments, overhead ceilings, pipes, beams, supports, ceilings, and rails in the coolers and slaughter room were observed with accumulations of fat, old meat scraps, and black stains, rust, grease, dirt, and dust.

- In one establishment, flies were observed in the locker room and boning room.

During this new audit, implementation of the required HACCP programs was now found to be deficient in six establishments (Ests. EEG-93, EEG-93-1, B-45, B-6, CEE-135, and B-477) of the seven establishments visited. Details are provided in the Slaughter/ Processing Controls section later in this report.

Entrance Meeting

On August 8, an entrance meeting with Belgian government officials was held at the Brussels offices of the Institute for Veterinary Inspection, Ministry of Public Health (IVK-IEV-MPH) and was attended by Dr. Lic. W. Smedts, Director, Animal Products (MPH); Dr. Jef Hooyberghs, Veterinary Officer, Department Animal Health, Ministry of Agriculture (MOA); Dr. Sofie Huyberechts, Veterinary Officer, IVK; Dr. Lic. P. Mortier, Auditor, IEV; Dr. Nelly Vermeeren, VSO, International Relations, IVK; Dr. Hoc. Editl, VSO, IEV; Dr. Smedis, IVK; Mr. Yvan Polet, Agricultural Specialist, Foreign Agriculture Service (FAS) American Embassy in Brussels; Mr. David W. Cottrell, Agricultural Attache, American Embassy in Brussels; Ms. Marie-France Rogge, Agricultural Specialist, FAS, American Embassy in Brussels; Dr. Judd Giezentanner, International Audit Staff Officer, FSIS; and Dr. Faiz R. Choudry, International Audit Staff Officer, FSIS.

Topics of discussion included the following:

- Welcome by Dr. W. Smedts, Chairman, and explanation of the Belgian meat inspection system.

- Overview of the National Residue Program.

- Training programs for veterinary meat inspection officials for pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs.

- Discussion of the previous audit report.

- The auditor provided copies of the data-collection instruments and a copy of the current Quarterly Regulatory and Enforcement Report.

- The audit itinerary and travel arrangements.

Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of Belgium's inspection system in May 2000.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the audits of the individual establishments be led by the inspection officials who normally conduct the periodic reviews for compliance with U.S. specifications. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

All seven establishments certified to export meat to the United States were audited on-site. Therefore no records review was conducted at the headquarters or at a district office.

Government Oversight

All inspection veterinarians in establishments certified by Belgium as eligible to export meat products to the United States were full-time or part-time Institute for Veterinary Inspection (IVK-IVE) employees of the Ministry Of Public Health (MPH), receiving no remuneration from either industry or establishment personnel.

The responsibilities of the central government are to participate and negotiate during new or revised EC legislation, to interpret and clarify EC Directives and federal laws and regulations, to ensure implementation, and to pass these documents on to the six district offices. These are then passed on to the lower levels of authority (official veterinarian in the establishment) by the district office. All inspection compliance is mandated by the central government and carried out by the district offices. The inspection activity is documented on a logbook by the veterinarian in the establishment to register remarks in a standardized way after each visit to the establishment. The official veterinarian is also responsible for the semi annual evaluation report, which is sent to the Cercle/Kring (District Office). In this report the official veterinarian was classifying the establishment on a scale from 0-4 (very good to very bad). The original report is kept in the archives of the official veterinarian. The management of the establishment receives a copy of the report but without the general conclusion. The follow-up report was carried out by the director of the Cercle/Kring. The director has three years to perform this evaluation and is mandated to send a summary of these semestrial reports to the central government.

The new uniform approach for veterinary supervision was implemented at plant level. However, in relation to daily supervision, corrective actions were not adequately followed-up. In several establishments the logbook was not filled out after each visit to the establishments. Although in most establishments, serious pre-operational and operational sanitation deficiencies were revealed, no remarks were noted in the logbook.

The supervision and authority are established or delegated by the central government. The district offices and official veterinarians in the establishments that work within these levels of authority are accountable to the central government. The veterinarians that actually perform the daily inspection activities are hired and paid by the central government. Disciplining or firing resident veterinarians is recommended by the district offices to the central government. The performance of responsibilities and duties of these veterinarians is, however, rarely questioned. Actual visits to determine competence by the "higher" levels of authority may not be routinely performed or documented. Although there are detailed instructions of what to do when visiting a "lower" level authority, including visits to an establishment, the central governments rely heavily upon the results of district audits of their inspection system.

In addition, it is the responsibility of the district to approve establishments for EC and U.S. markets and to withdraw federal approval from these establishments. The district office notifies the central government office in Brussels of each approval and withdrawal. The central government office normally does not visit these establishments as a result of the approval and does not supervise or question the validity of a district's decision to approve or withdraw an establishment. However, the districts work closely with the local veterinarians to secure compliance for the approvals and have extensive documentation of their pre-approval inspections of the establishments.

Establishment Audits

Seven establishments (B-6, B-45, CEE-135, B-156, EEG-93, EEG-93-1, and B-477) were certified to export meat products to the United States at the time this audit was conducted, and therefore all seven were visited for on-site audits, even though meat from animals slaughtered in Belgium was ineligible for U.S. export. In three of the seven establishments visited (B-156, B-477, and B-45), both Belgian inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products. Two of these establishments were found acceptable and one establishment (B-45) was rated acceptable subject to re-review on the next audit because of several deficiencies regarding sanitation and the condition of facilities, which are mentioned later in this report. Four establishments (B-6, EEG-93, EEG-93-1, and CEE-135) were found to be unacceptable because of critical sanitation problems and direct contamination.

Laboratory Audits

During the laboratory audits, emphasis was placed on the application of procedures and standards that were equivalent to U.S. requirements. Information was also collected about the risk areas of government oversight of accredited, approved, private laboratories; intra-

laboratory quality assurance procedures, including sample handling; and methodology. following risk areas was also collected:

Testing for *Salmonella, E.coli*, and *Listeria monocytogenes* was being performed at the Universite de Liege's (ULG) microbiology laboratory which was audited on August 17, 2001. Effective controls were in place for sample handling and frequency, timely analysis, data reporting, tissue matrices for analyses, equipment operation and corrective actions. The auditor determined that the system met the criteria established for the use of government laboratory under FSIS's Pathogen Reduction/HACCP rule.

- The laboratory was accredited by the accreditation authority of Belgium (Ministry of Economic Affairs Accreditation Department) on March 3 2001. .

- The inter-laboratory check sample program (ring test) was carried out three times a year.

Establishment Operations by Establishment Number

The following operations were being conducted in the seven establishments:

Swine slaughter- two establishments (EEG-93, and CEE-135)
Pork curing, cooking, smoking and canning - two establishments (B-06, and B-156)
Chicken, pork, and beef cooking for ready-to eat meals – one establishment (B-477)
Pork boning and curing and cooking – one establishment (B-45)
Pork boning – one establishment (EEG-93-1)

SANITATION CONTROLS

Based on the on-site audits of establishments, Belgium's inspection system had controls in place for water potability records; chlorination procedures; back-siphonage prevention; hand washing facilities; separation of operation; temperature control; lighting; operation work space; ventilation; and outside premises.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The following variations were noted.

- In all seven establishments, the written SSOP procedure did not address pre-operational sanitation.

- In all seven establishments, the written SSOP did not address operational sanitation.

- In two of seven establishments, the written SSOP did not address pre-operational sanitation (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils

- In two establishments, the SSOP procedure did not identify the individual responsible for implementing and maintaining the activities.

- In all seven establishments the monitoring records for pre-operational and operational sanitation indicated that deficiencies were not identified and any corrective actions taken were not being maintained on a daily basis.

- In two establishments, the written SSOP procedure was not dated and signed by the person with overall on-site authority.

- In all seven establishments, the Belgian meat inspection officials were not monitoring pre-operational and operational sanitation adequately to verify the adequacy and effectiveness of the sanitation SSOP and for any identified deficiencies corrective actions were not taken or were not followed.

Cross-Contamination: In the area of cross-contamination, actual product contamination and the potential for product contamination was found in all seven establishments audited. In some establishments but not all, the GOB took corrective actions. Specific findings for each establishment audited on-site can be found in Attachment F.

Examples of findings of actual product contamination include:

- In five establishments, dripping condensate from overhead refrigeration units, ceilings, pipes, rail, ducts, and exhaust system that were not cleaned/sanitized daily was falling onto carcasses and exposed edible product in the coolers, and processing rooms. In another establishment, water was leaking from an overhead pipes onto minced meat in the processing room

- In three establishments, sanitizers were not maintained at the required temperature (82ºC) in the slaughter and processing rooms during the operation. In four establishments, the sanitizing facility for knives in the slaughter and processing rooms was designed in such a way that it was not possible to sanitize knives completely and effectively. In one of these establishments, the automatic hog carcass splitting saw and sticking knife were not sanitized completely and effectively between each use in the slaughter room.

- In two establishments, the automatic viscera conveyor and offal hook conveyor in the slaughter room was soiled with blood, fat, grease, ingesta, and fecal materials after washing/sanitizing in the slaughter room and in both establishments, hog carcasses were contacting employees' working platforms and employees' boots in the slaughter rooms. In these establishments, dirty water was dripping from the employees platform onto a viscera conveyor under the platform at the evisceration station in the slaughter room.

- In six establishments, insanitary equipment was directly contacting edible product in the processing rooms, offal room, carcass holding room, coolers, and slaughter rooms. For example, containers of edible product, working tables, automatic viscera conveyor, meat hooks, meat chopper, meat grinder, and edible product conveyor belt were found with fat, dried pieces of meat, blood, grease, and black discoloration from previous days' operations.

Examples of findings of potential cross-contamination of product include:

- In one establishment, water was overflowing from containers for washing sausages creating the potential for cross contamination from water splashing from the wet floor in the processing room. In another establishment, several overhead doors in the processing rooms created the potential for cross contamination from dripping dirty water on employees' clothes and exposed edible product when passing through the doors. In the third establishment, offal was being washed in tanks without water overflow.

- In five establishments, overhead ceilings, pipes, beams, ceilings, and rails in the coolers, offal room, boning room, packaging room, and slaughter rooms were observed with accumulations of fat, old meat scraps, and black stains, rust, flaking paint, dirt, dust, grease, mold, and cobwebs.

- In five establishments, several employees were observed picking up dirty objects from the floor, using a dirty steel which was kept in the sink, using knives that were kept in dirty containers, picking up sausages from the floor, handling dirty pallets, picking up pieces of meat from the floor and, without washing their hands and washing/sanitizing dirty equipment, handling edible product.

Personnel Hygiene and Practices: In the area of personal hygiene and practices, the following deficiencies were noted.

- In one establishment, employees were observed not keeping suitable level of cleanliness of their working clothes. Clothes were observed with blood spots, black stains, and dirt. Employees were using one frock per week. Working clothes were contacting employees boots in the locker room.

- Walls in the coolers, offal room, and slaughter room were observed with flaking paint and mold in one establishment. Establishment officials ordered correction.

- A build-up of dust or debris, cobwebs, dead flies, and other insects were observed in the dry storage and spice rooms. The packaging materials, ingredients, and spices were not stored on racks or racks were not high enough and were not kept away from walls and separate from unused equipment and other materials. Numerous holes through the walls to outside were not sealed properly to prevent the entrance of rodents and other vermin in two establishments.

Product Handling and Storage**:** In the area of product handling and storage, the following deficiencies were found. Establishment officials ordered corrections.

- In two establishments, carcasses were found with grease, oil, rail dust, toenails, fecal material/ingesta contamination in the coolers and boning rooms.

- In one establishment, edible product that contacted the floor (dropped meat) was not reconditioned in a sanitary manner before being added to the edible product.

- In four establishments, containers for edible and inedible product were neither identified nor stored separately to prevent possible cross contamination.

- In five establishments pest control prevention was inadequate. For example, in four establishments gaps at the bottoms and sides of doors in the hog stunning room, dry storage, shipping, and casing rooms and in another establishment opening (approximately 4 by 6 feet) through the ceilings to outsides in the carcass holding room, were not sealed properly to prevent the entry of rodents and other vermin. Establishment officials ordered correction.

- In one establishment the non-food chemical compounds and cleaning equipment were not stored on racks and unused equipment were stored in such a way that prevented monitoring of pest control program. Numerous dead and alive flies, other insects and build-up of dirt, dust, and cobwebs were observed in this room which had direct access to casing and offal rooms.

ANIMAL DISEASE CONTROLS

Belgium's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

RESIDUE CONTROLS

Belgium's National Residue Testing Plan for 2001 was being followed, and was on schedule. The Belgian inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals.
Please see laboratory report-E

SLAUGHTER/PROCESSING CONTROLS

Except as noted below, the Belgian inspection system had controls in place to ensure adequate animal identification; antemortem inspection procedures; antemortem disposition;

humane slaughter; postmortem inspection procedures; postmortem dispositions; restricted product control; ingredients identification; control of restricted ingredients; formulations; packaging materials; label approvals; inspector monitoring; processing equipment; processing records; empty can inspection; filling procedures; container closure examination; and post-processing handling.

- In both slaughter establishments, the zero-tolerances for visible fecal materials and ingesta contamination on carcasses were not enforced by the GOB meat inspection officials and there was no monitoring record maintained to verify this activity.

HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment B).

The HACCP programs were reviewed during the on-site audits of seven establishments. The auditor found the following deviations from FSIS regulatory requirements:

- One establishment did not have a flow chart that describes the process steps and product flow.

- Three establishments did not adequately conduct a hazard analysis.

- In five establishments, the HACCP plan did not adequately specify critical limits for each CCP and the frequency with which these procedures would be performed.

- In five establishments, the HACCP plan did not adequately address the corrective actions to be followed in response to a deviation from a critical limit.

- In six establishments, the HACCP plan did not adequately state the procedures that the establishment would use to verify that the plan was being effectively implemented and the frequencies with which these procedures would be performed. The on-going verification activities of the HACCP program were not performed adequately by the establishment personnel.

- In five establishments, the HACCP plan record-keeping system was not adequately documenting the monitoring of CCPs.

- In two establishments, the HACCP plan was not dated and signed by a responsible establishment official.

- In six establishments, the final review of all documentation associated with the production of the product prior to shipping was not performed.

Testing for Generic *E. coli*

E.coli testing is not required in Belgium's establishments that are certified to export meat products to the United States because APHIS regulations prohibit the importation of meat from hogs slaughtered in Belgium. Belgium obtains meat for U.S. export from hogs slaughtered in a country eligible to export slaughtered hogs to the United States.

Additionally, establishments had adequate controls in place to prevent meat products intended for Belgian domestic consumption from being commingled with products eligible for export to the U.S.

ENFORCEMENT CONTROLS

Except as noted below, and with the exception of the unacceptable establishments (EEG-93, EEG-93-1, CEE-135, and B-6), the Belgian inspection system controls [control of restricted product and inspection samples, boneless meat reinspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with Domestic product, monitoring and verification of establishment programs and controls (including the taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other countries for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

Testing for *Salmonella* Species

Belgium had adopted the FSIS regulatory requirements for HACCP. *Salmonella* testing is not required in Belgium's establishments that are certified to export meat products to the United States because APHIS regulations prohibit the importation of meat from hogs slaughtered in Belgium. Belgium obtained meat for U.S. export products from hogs slaughtered in third countries that are eligible to export slaughtered hog meat to the United States.

Species Verification Testing

At the time of this audit, Belgium was not exempt from the species verification-testing requirement. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements with the following exception:

- In one establishment, species verification testing was not being conducted in accordance with FSIS requirements.

Listeria monocytogenes

- The control of *Listeria monocytogenes* in not included in the HACCP plan in establishments producing ready-to-eat products.

- Establishment officials have a surveillance program for *Listeria monocytogenes* testing at variable frequencies of sampling such as per week/month and/or per year in establishments producing ready-to-eat products. The MPH meat inspection service was taking between five to ten samples per year for *Listeria monocytogenes*.

Monthly Reviews

The internal review program was applied equally to both export and non-export establishments. Internal review visits were not announced in advance and were conducted, at times by individuals and at other times by a team of reviewers, two to three times yearly. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the Keurkring LVLB (District Office) MPH offices, and were routinely maintained on file for a minimum of 3 years.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility to be reinstated, assistant to the district director is empowered to conduct an in-depth review, and the results are reported to District Director for evaluation; they formulate a plan for corrective actions and preventive measures.

The following deficiencies were noted.

- In all seven establishments, monthly supervisory visits were not performed. Only two or three internal reviews were conducted per year by the district officials. Some district supervisors were visiting establishments monthly but no supervisory audits were conducted.

- In five establishments, GOB meat inspection officials were not providing adequate daily inspection coverage to processed products establishments. Inspectors were visiting establishments at variable frequencies such as once a week, twice a week, daily, and between half-hour to four hours each visit.

- In two establishments, GOB meat inspection officials were not providing daily inspection coverage for second and third shift operations.

Enforcement Activities

Controls were in place to ensure adequate export product identification, inspector verification, export certification, a single standard of control throughout the establishment,

and adequate controls for security items, shipment security, and product entering the establishments from outside sources.

The domestic and exporting country requirements are enforced by MPH, which has full power to initiate all enforcement actions.

Inspection System Controls

- In two establishments, the zero-tolerances for visible fecal material/ ingesta contamination, and milk on carcasses were not enforced by the GOB meat inspection officials, and there was no monitoring record maintained to verify this activity.

- In four establishments, containers for edible and inedible product neither identified nor stored separately to prevent possible product cross contamination.

Exit Meetings

An exit meeting was conducted in Brussels at the Institute for Veterinary Inspection on August 23. The Belgian participants were Mr. Beernaert Luc, Director, FAVV; Dr. Lic. W. Smedts, Headquarter (HQ), Physicochemistry, IVK, MPH; Dr. Martine Jouret, HQ, Microbiology, IVK; Dr. Sofie Huyberechts, HQ, International Relations (IR), IVK; Dr. Brunner Markus, HQ, IR; Dr. Lic. P. Mortier, Auditor, IEV; Dr. Smedis Griet, HQ, Red Meat, IVK; Dr. Clysters Jos, HQ, Director Residues Control, Fraud; Dr. Lic. Gustin Joel, HQ, Director Quality and prevention; Dr. J. Vanbroekhoven, Director; Dr. Lic. A. Destickere Andre, Head of the District (HD), West-Vlaanderen Zone Zuid; Dr. Lic.Guy Lagae, Assistant to Head of the District, West-Vlaanderen Zone Zuid; Dr. Lic. Albrecht Van Brempt, HD, Oost-Vlaanderen; Dr. Lic. Dendas William, HD, Limburg en Vlaams Brabant; Dr. Naassens Pierre, HD, Antwerpen; Dr. Lic. Dubois Philippe, HD, Luik en Luxemburg; Dr. RulkinJean-Paul, Assistant to Head of the District, Luik en Luxemburg; Dr. Lic. Mortier Philippe, Libramont; Dr. Lic. Vandenbrande Gabriel, HD, West-Vlaanderen Zone Noord; Dr. Lic. Roland Paul, Assistant to Head of the District, Namen, Henegouwen en waals-Brabant; and the U.S. participants were Mr. Yvan Polet, Agricultural Specialist, American Embassy in Brussels; Mr. Philip Letarte, Agricultural Counselor, American Embassy in The Hague; and Dr. Faizur R. Choudry, International Audit Staff Officer, FSIS, USDA.

Mr. Luc Beernaert, Director, Federal Agency for the Safety of the Food Chain (FAVV), opened the meeting. Mr. L. Beernaert, indicated that he would take the necessary steps to ensure that corrective actions and preventive measures, including HACCP, SSOPs, programs, sanitation problems, monthly visits and daily continuous inspection coverage as promised during the audits and exit meetings in the individual establishments, would be implemented.

The auditor explained to the GOB inspection officials that their inspection system was audited in accordance with the European Union/United States Veterinary Equivalence Agreement, the auditors audited the meat inspection system using European Directives, specifically Council Directives 96/23/EC of April 29, 1996, 96/22/EC of April 29, 1996, and 64/433/EEC of June 1964. These three directives have been declared equivalent under the

Agreement. In areas not covered by these directives, the auditors audited against FSIS requirements and equivalence determinations.

The following topics were discussed:

1. The continuing problems with the implementation and maintenance of SSOP in certified establishments.
2. The continuing problems with implementation and maintenance of HACCP systems in certified establishments.
3. Instances of actual product contamination and instances of the potential for direct product contamination.
4. Inadequate inspection system controls, including the identification of containers for edible and inedible product, enforcement of the zero-tolerance for visible fecal material/ingesta contamination, and milk on carcasses, and species verification testing program
5. The lack of adequate daily inspection coverage in establishments producing products for export to the U.S.
6. The lack of periodic supervisory reviews of certified establishments.
7. The lack of daily inspection coverage for second and third shift operations of processing establishment.

Mr. Luc Beernaert, Director, Federal Agency for the Safety of the Food Chain (FAVV), stated that he would take the necessary steps to ensure that corrective actions and preventive measures, including HACCP, SSOP, sanitation problems, and monthly visits as promised during the audits and exit meetings in the individual establishments would be implemented.

CONCLUSION

The Belgian meat inspection system has major deficiencies, which demonstrate lack of government oversight as evidenced by the findings presented in the report and summarized below.

Seven establishments were audited: two were acceptable, one was evaluated as acceptable/re-review, and four were unacceptable. The GOB meat inspection officials reinforced the assurances made by the field personnel during and at the conclusions of the on-site audits of the establishments, and stated that they would ensure prompt compliance.

However, these assurances have been given previously at the conclusion of the May 2000 audit, yet little if any corrective actions were taken.

DR. FAIZUR R. CHOUDRY
International Audit Staff Officer

(signed) DR. FAIZUR R. CHOUDRY

ATTACHMENTS

A. Data collection instrument for SSOPs
B. Data collection instrument for HACCP programs
C. Data collection instrument for *E. coli* testing.
D. Data collection instrument for *Salmonella* testing
E. Laboratory Audit Forms
F. Individual Foreign Establishment Audit Forms
G. Written Foreign Country's Response to the Draft Final Audit Report (when it becomes available)

Attachment A

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. Sanitation addressed	4. Contact surfaces addressed	5. Fre-quency addressed	6. Respons-ible indiv. identified	7. Docu-mentation done daily	8. Dated and signed
B-6	√	NO	NO	√	√	√	NO	√
B-45	√	NO	NO	NO	√	√	NO	NO
CEE-135	√	No	NO	No	√	√	NO	NO
B-156	√	NO	NO	√	√	√	NO	√
EEG-93	√	NO	NO	√	√	NO	NO	√
EEG93-1	√	No	NO	√	√	NO	NO	√
B-477	√	NO	NO	√	√	√	NO	√

Attachment B

Data Collection Instrument for HACCP Programs

Each of the establishments approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment has conducted a hazard analysis that includes food safety hazards likely to occur.
3. The analysis includes the intended use of or the consumers of the finished product(s).
4. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
5. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
6. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
7. The plan describes corrective actions taken when a critical limit is exceeded.
8. The HACCP plan was validated using multiple monitoring results.
9. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
10. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
11. The HACCP plan is dated and signed by a responsible establishment official.
12. The establishment is performing and documenting pre-shipment document reviews as required.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Haz. analysis –all ID'ed	3. Use & users included	4. Plan for each hazard	5. CCPs for all hazards	6. Monitoring is specified	7. Corr. actions are described	8. Plan validated	9. Adequate verific. procedures	10. Adequate documentation	11. Dated and signed	12. Pre-shipment doc. Reviews
B-6	√	√	√	√	√	No	No	No	No	No	√	No
B-45	√	No	√	√	√	No	No	No	No	No	√	No
CEE-135	√	No	√	√	No	No	No	No	No	No	No	No
B-156	√	√	√	√	√	√	√	√	√	√	√	√
EEG-93	No	No	√	√	No	No	No	No	No	No	No	No
EEG-93-1	√	√	√	√	√	No	No	No	No	No	√	No
B-477	√	√	√	√	√	√	√	No	No	√	√	No

Attachment C

Data Collection Instrument for Generic *E. coli* Testing

Each establishment (except Est. 12, which was a cold-storage facility) was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli.*
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The proper carcass site(s) and/or collection methodology (sponge or excision) is being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method or an equivalent method.
9. The results of the tests are being recorded on a process control chart showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1.Written procedure	2. Sampler designated	3.Sampling location given	4. Predomin. species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
B-6	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
B-45	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
CEE-135	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
B-156	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EEG-93	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EEG-93-1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
B-477	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Attachment D

Data Collection Instrument for *Salmonella* testing

Each slaughter establishment was evaluated to determine if the basic FSIS regulatory requirements for *Salmonella* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. Salmonella testing is being done in this establishment.

2. Carcasses are being sampled.

3. Ground product is being sampled.

4. The samples are being taken randomly.

5. The proper carcass site(s) and/or collection of proper product (carcass or ground) is being used for sampling.

6. Establishments in violation are not being allowed to continue operations.

The results of these evaluations were as follows:

Est. #	*1. Testing as required*	*2. Carcasses are sampled*	3. Ground product is sampled	4. Samples are taken randomly	5. Proper site and/or proper prod.	6. Violative est's stop operations
B-6	N/A	N/A	N/A	N/A	N/A	N/A
B-45	N/A	N/A	N/A	N/A	N/A	N/A
CEE-135	N/A	N/A	N/A	N/A	N/A	N/A
B-156	N/A	N/A	N/A	N/A	N/A	N/A
EEG-93	N/A	N/A	N/A	N/A	N/A	N/A
EEG-93-1	N/A	N/A	N/A	N/A	N/A	N/A
B-477	N/A	N/A	N/A	N/A	N/A	N/A